

# **EXHIBIT 3**

Letter from Matthew Shayefar  
dated January 15, 2017  
(without enclosures)

**BOSTON LAW GROUP, PC**  
**ATTORNEYS AT LAW**

Main (617) 928-1800

825 BEACON STREET, SUITE 20  
NEWTON CENTRE, MASSACHUSETTS 02459

Fax (617) 928-1802

**Via Email**

January 15, 2017

Randazza Legal Group, PLLC  
4035 S. El Capital Way  
Las Vegas, Nevada 89147  
ecf@randazza.com

**Re: In Re: DMCA Subpoena to Borjan Solutions, S.L.**  
**U.S.D.C. District of Nevada, Case No. 16-MS-105**

Dear Counsel,

Please recall that this law firm represents Borjan Solutions S.L. (“BSSL”). We are in receipt of your subpoena pursuant to 17 U.S.C. § 512(h) dated December 23, 2016 requesting information about the individuals who caused videos to be uploaded to BSSL’s websites, the URLs of which were included with the subpoena. A copy of that subpoena is attached hereto for reference as Exhibit 1.

Please be advised that BSSL is not a United States entity, is not subject to personal jurisdiction in the United States and is not subject to United States law. Therefore, BSSL is not obligated to respond to the subpoena pursuant to the laws of the United States. However, as a courtesy, and in the interest of cooperating with United States intellectual property owners, and in accordance with Section 3.3 of the Settlement Agreement and Mutual Release between BSSL and SSC Group, LLC d/b/a Porn Pros, BSSL responds to the subpoena without subjecting itself to the personal jurisdiction in or the law of the United States.

BSSL makes specific reference to Section 3.3 of the Settlement Agreement and Mutual Release, which states, in relevant part, that BSSL’s response to the subpoena “shall not constitute a waiver or consent to personal jurisdiction of any U.S. state or federal court” and that BSSL’s response to the subpoena “shall be inadmissible in any legal proceedings by PornPros against Respondents, for the purpose of establishing the existence of personal jurisdiction.”

Attached hereto as Exhibit 2 is information from BSSL in response to the subpoena.

Should you have any questions, comments or concerns, you may contact me directly at 617-928-1806 or at matt@bostonlawgroup.com.

Very Truly Yours,  
/s/ Matthew Shayefar, Esq.